

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Civil Action No. 2:23-cv-00641-JRG-RSP

JURY DEMANDED

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION TO EXTEND RESPONSE DEADLINE [DKT. NO. 62]**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") seek to clarify certain points raised in Plaintiff Headwater Research, LLC's ("Headwater") Motion to Extend Response Deadline (Dkt. 62).

As an initial matter, Samsung does not oppose Headwater's motion to extend its response deadline.¹ However, because Samsung does not believe that Headwater has good cause for the requested extension,² Samsung's non-opposition was expressly conditioned on two things (neither of which Headwater's motion addresses):

- **First**, Samsung would "receive a reciprocal one week extension for its Reply (from February 25th to March 4th)." Ex. 1 at 1.
- **Second**, Headwater's Opposition will not discuss or cite to any events that arise, at deposition or otherwise (e.g., by declarations), after February 11, the original due date for Headwater's opposition. *Id.*

¹ Headwater's "Certificate of Conference" incorrectly refers to Headwater's motion as a "joint statement," which it is not. *See* Dkt. 62 at 4.

² *See* Ex. 1 at 1 ("[W]e have serious doubts that Headwater's request is supported by good cause[.]"); *see also* Dkt. 62 at 1 (conclusory assertion that good cause supports Headwater's request absent any explanatory information).

Headwater filed its “unopposed motion with that understanding.” *Id.*

Accordingly, to the extent the Court grants Headwater’s Motion to Extend Response Deadline, Samsung respectfully requests that: (1) Samsung receive a reciprocal extension to file its Reply brief from February 25th to March 4th, and (2) Headwater’s opposition be precluded from discussing or citing to any events that arise—either by deposition or otherwise—after February 11, the original due date for Headwater’s opposition. *Id.*

Dated: February 11, 2025

Respectfully submitted,

By: /s/ Jared Hartzman

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on February 11, 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jared Hartzman

Jared Hartzman